

Randall R. Lee (*pro hac vice*)
COOLEY LLP
1333 2nd Street
Santa Monica, CA 90401
randall.lee@cooley.com
Telephone: (310) 883-6485
Facsimile: (310) 883-6500

Christopher Johnstone (*pro hac vice*)
WILMER CUTLER PICKERING HALE
AND DORR LLP
950 Page Mill Road
Palo Alto, CA 94304
chris.johnstone@wilmerhale.com
Telephone: (650) 858-6147
Facsimile: (650) 858-6100

Attorneys for Defendant Robert Ladd

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE)	
COMMISSION,)	
)	
Plaintiff,)	Case No. 1:18-cv-08175-ER
)	
v.)	
)	
BARRY C. HONIG,)	ORAL ARGUMENT REQUESTED
<i>et al.</i> ,)	
)	
Defendants.)	
)	

**NOTICE OF DEFENDANT ROBERT LADD'S MOTION TO DISMISS
THE SECOND AMENDED COMPLAINT PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 12(b)(6)**

PLEASE TAKE NOTICE that at a date and time to be determined by the Court,
Defendant Robert Ladd by and through counsel will move this Court for an order dismissing
Plaintiff's complaint as to Mr. Ladd for failure to state a claim upon which relief may be granted

pursuant to Federal Rule of Civil Procedure 12(b)(6) and granting such other relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that Mr. Ladd will rely on the accompanying Memorandum of Law in Support of Defendant Robert Ladd's Motion to Dismiss the Second Amended Complaint Pursuant to Federal Rule of Civil Procedure 12(b)(6) and the Request for Judicial Notice and the exhibits attached thereto.

PLEASE TAKE FURTHER NOTICE that Mr. Ladd requests oral argument.

Dated: April 30, 2020

Respectfully submitted,

/s/ Randall R. Lee
Randall R. Lee (*pro hac vice*)
COOLEY LLP
1333 2nd Street
Santa Monica, CA 90401
randall.lee@cooley.com
Telephone: (310) 883-6485
Facsimile: (310) 883-6500

Christopher Johnstone (*pro hac vice*)
WILMER CUTLER PICKERING HALE
AND DORR LLP
950 Page Mill Road
Palo Alto, CA 94304
chris.johnstone@wilmerhale.com
Telephone: (650) 858-6147
Facsimile: (650) 858-6100

Attorneys for Defendant Robert Ladd